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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PENDLETON DIVISION

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OREGON FIREARMS FEDERATION,	)
INC.,	)
et al.,	)
	)Civil No.
Plaintiffs,	)2:22-cv-01815-IM
v.	)(Lead Case)
	)
KATE BROWN, et al.,	)Civil No.
	)3:22-cv-01859-IM
Defendants.	)(Trailing Case)
	)
(Continued)	)Civil No.
	)3:22-cv-01862-IM
	)(Trailing Case)
	)
	)Civil No.
	)3:22-cv-01869-IM
	)(Trailing Case)

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\* VIDEOCONFERENCE \*

VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF  
EXPERT BRIAN DELAY

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Witness located in:  
Berkeley, California

\* All participants appeared via videoconference \*

DATE TAKEN: March 14, 2023

REPORTED BY: Tia B. Reidt, Washington RPR, CCR 2798  
Oregon # 22-0001

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(continued) )  
)  
MARK FITZ, et al., )  
)  
Plaintiffs, )  
v. )  
)  
ELLEN F. ROSENBLUM, et al., )  
)  
Defendants. )  

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)  
)  
KATERINA B. EYRE, et al., )  
)  
Plaintiffs, )  
)  
v. )  
)  
ELLEN F. ROSENBLUM, et al., )  
)  
Defendants. )  

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)  
DANIEL AZZOPARDI, et al., )  
)  
Plaintiffs, )  
v. )  
)  
ELLEN F. ROSENBLUM, et al., )  
)  
Defendants. )  

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APPEARANCES

For Oregon Firearms Federation:

LEONARD WILLIAMSON  
VAN NESS WILLIAMSON  
960 Liberty Street SE, Suite 100  
Salem, OR 97302  
(503) 365-8800  
L.williamson@vwllp.com

For the State of Oregon Defendants:

HANNAH HOFFMAN  
ERIN DAWSON  
MARKOWITZ HERBOLD  
1455 SW Broadway, Suite 1900  
Portland, OR 97201  
(503) 972-5076  
HannahHoffman@markowitzherbold.com

Videographer:

MICHAEL TAKOS  
BUELL REALTIME REPORTING  
1325 Fourth Avenue, Suite 1840  
Seattle, WA 98101  
(206) 287-9066  
Info@buellrealtime.com

\* \* \* \* \*

1 I'm not a hundred percent sure about that.

2 BY MR. WILLIAMSON:

3 Q. And do you own these merely as examples or do  
4 you shoot them?

5 A. I shoot them.

6 Q. In terms of your own personal research into  
7 firearms, do you go to, for example, gun shows or  
8 museums where these things are displayed or is it  
9 mostly by book?

10 A. Well, most of my work is with documents and  
11 books. But I certainly do go to museums and have, you  
12 know, learned that way as well.

13 Q. Which museums have you attended?

14 A. Well, the Cody Firearms Museum, for example,  
15 where I both got to enjoy the museum as a patron. They  
16 have a really remarkable collection and work in the  
17 archive there as a researcher.

18 Q. Any other firearms museums?

19 A. Well, collections in other museums. So the  
20 Met, for example, has a remarkable collection of arms  
21 and armor, including firearms. The British Museum,  
22 where I did work in -- I did work in London, research  
23 in London for six or seven months. I often went to the  
24 British Museum and spent time in their firearms  
25 collection just as a patron.

1 encompass the colonies as well.

2 Q. Would it include Europe --

3 A. Yes.

4 Q. -- that statement?

5 Okay.

6 A. That's right.

7 Q. Earlier, you mentioned -- maybe I am  
8 misstating this, but you did some research at the Cody  
9 Museum; is that correct?

10 A. That's correct.

11 Q. So it was just not -- you weren't there just  
12 for a visit. You were doing some primary research?

13 A. Yeah. There is a library and archive there  
14 that -- at least I think it still is. At the time, it  
15 was called the McCracken Research Library. And the  
16 McCracken Research Library has -- among many other  
17 amazing collections, they have the Winchester Repeating  
18 Arms Company archive.

19 Q. Okay.

20 Are you familiar with a book called "The Guns  
21 of John Moses Browning" by Nathan Gorenstein?

22 A. No, I'm not.

23 Q. Did Browning do work for Winchester, do you  
24 recall?

25 A. I don't recall. I'm sorry.

## C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF PIERCE

I, Tia Reidt, a Certified Court Reporter in and for the State of Washington, do hereby certify that the foregoing transcript of the deposition of Brian DeLay, having been duly sworn, on March 14, 2023, is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 17th day of March, 2023.



/S/ Tia B. Reidt  
Tia B. Reidt, # 22-0001  
NOTARY PUBLIC, State of  
Washington.  
My commission expires  
5/15/2026.